## UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS, DEL RIO DIVISION

OSCAR ORONA IANF of N.O., a minor, CRISTINA OLVAREZ IANF of K.O., a minor, and ANGELICA RODRIGUEZ IANF of L.G., a minor, JOSE FLORES, Individually and as Representative of the Estate of J.F., Jr., deceased; MANUEL LOZANO, Individually **LYLIANA** GARCIA, Individually; **ALEJANDRO** GARCIA, **Individually** and Representative of the Estate of Irma Garcia, deceased; and ELSA AVILA.

## **Plaintiffs**

v.

CHRISTOPHER KINDELL, an individual; VICTOR ESCALON, an individual; JOEL BETANCOURT, an individual; JUAN MALDONADO, an individual; CRIMSON ELIZONDO, an individual; RICARD BOGDANSKI, an individual, LUKE WILLIAMS, an individual; UVALDE CONSOLIDATED INDEPENDENT SCHOOL DISTRICT AND/ OR UCISD POLICE **DEPARTMENT; PEDRO "PETE"** ARREDONDO, an individual; ADRIAN GONZALES, an individual; MANDY GUTIERREZ, an individual, JESUS "JJ" SUAREZ, an individual, TEXAS **DEPARTMENR OF PUBLIC SAFETY** OFFICERS DOES 1-84; and MOTOROLA SOLUTIONS, INC.

**Defendants** 

Civil Action. 2:24-CV-00049-AM

## MOTION FOR WITHDRAWAL OF COUNSEL FOR PLAINTIFFS AND SUBSTITUTION OF COUNSEL

TO THE HONORABLE UNITED STATES DISTRICT COURT CHIEF JUDGE ALIA MOSES:

NOW COMES Plaintiffs OSCAR ORONA IANF father and next friend of N.O., a minor, CRISTINA OLVAREZ mother and next friend of K.O., a minor, ANGELICA RODRIGUEZ mother and next friend of L.G., a minor, JOSE FLORES Individually as Wrongful Death Beneficiary and as Representative of the Estate of J.F., Jr., deceased minor, MANUEL LOZANO, Individually Wrongful Death Beneficiary of IRMA GARCIA, ALEJANDRO GARCIA, Individual Wrongful Death Beneficiary and representative of the estate of IRMA GARCIA, LYLIANA GARCIA, Individual Wrongful Death Beneficiary of IRMA GARCIA and ELSA AVILA and files this Motion for Withdrawal of Counsel and Substitution of Counsel and in support hereof would respectfully show unto the Court as follows:

- 1. Attorney Robert Paul Wilson is currently listed as the attorney of record for Plaintiffs in the above numbered and captioned matter.
- 2. Attorney Robert Paul Wilson is no longer employed with the law firm of Thomas J. Henry Injury Attorneys and therefore, Plaintiffs would request withdrawal of Robert Paul Wilson as attorney of record in this matter.
- 3. Additionally, Plaintiffs would designate Alan Dale Hicks to be substituted as attorney of record herein and shall be listed as lead attorney to be noticed for Plaintiffs OSCAR ORONA IANF father and next friend of N.O., a *minor*, CRISTINA OLVAREZ mother and next friend of K.O., a *minor*, ANGELICA RODRIGUEZ mother and next friend of L.G., a *minor*, JOSE FLORES Individually as Wrongful Death Beneficiary and as Representative of

the Estate of J.F., Jr., deceased minor, MANUEL LOZANO, Individually Wrongful Death Beneficiary of IRMA GARCIA, ALEJANDRO GARCIA, Individual Wrongful Death Beneficiary and representative of the estate of IRMA GARCIA, LYLIANA GARCIA, Individual Wrongful Death Beneficiary of IRMA GARCIA and ELSA AVILA:

Alan Dale Hicks
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WHEREFORE, PREMISES CONSIDERED, Plaintiffs respectfully request that Attorney Robert Paul Wilson is withdrawn as counsel of record for Plaintiffs and Attorney Alan Dale Hicks is substituted as lead counsel of record for Plaintiffs and such other and further relief to which the Plaintiffs may be entitled at law or in equity.

Respectfully submitted,

THOMAS J. HENRY INJURY ATTORNEYS 5711 UNIVERSITY HEIGHTS, SUITE 101 SAN ANTONIO, TEXAS 78249 Tel. (210) 656-1000 FAX. (361) 985-0601

By

Alan Dale Hicks

State Bar No. 09575430

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ATTORNEY FOR PLAINTIFFS
\*Service by email to this address only

## **CERTIFICATE OF SERVICE**

I hereby certify that on the 28<sup>th</sup> day of June 2024, I electronically filed the foregoing document with the Clerk of the Court through the ECF system and an email notice of the electronic filing was sent to all attorneys of record.

Alan Dale Hicks